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8 Attorneys for Defendants
GIGANEWS, INC., and
9 LIVEWIRE SERVICES, INC.

10 UNITED STATES DISTRICT COURT
11 CENTRAL DISTRICT OF CALIFORNIA
12 WESTERN DIVISION

13 PERFECT 10, INC., a California
corporation,

14 Plaintiff,

15 v.

16 GIGANEWS, INC., a Texas Corporation;
17 LIVEWIRE SERVICES, INC., a Nevada
corporation; and DOES 1 through 100,
18 inclusive,

19 Defendants.

20 GIGANEWS, INC., a Texas Corporation;
21 LIVEWIRE SERVICES, INC., a Nevada
Corporation,

22 Counterclaimants,

23 v.

24 PERFECT 10, INC., a California
Corporation,

25 Counterdefendant.

Case No.: 11-cv-07098-ABC (SHx)

DISCOVERY MATTER
Before Hon. Stephen J. Hillman

**DEFENDANTS GIGANEWS, INC.
AND LIVEWIRE INC.'S NOTICE
OF MOTION AND MOTION TO
COMPEL RESPONSES TO
INTERROGATORIES AND
PRODUCTION OF DOCUMENTS**

Date: April 28, 2014

Time: 2:00 P.M.

Courtroom: 550 (Roybal)

Discovery Cut-off: June 30, 2014
Pretrial Conference: January 19, 2015
Trial Date: January 27, 2015

1 **TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE** that on April 28, 2014 at 2:00 p.m., or as soon
3 thereafter as counsel may be heard in Courtroom 550 of the United States District
4 Court for the Central District of California, located at 255 East Temple Street, Los
5 Angeles, CA 90012-3332, Giganews, Inc. and Livewire Services, Inc.
6 (“Defendants”) will and hereby do move for an order compelling Perfect 10 to
7 provide responses to interrogatories (Interrogatory Nos. 1-6) and to produce
8 documents (Request Nos. 4-20, 23-68, 70-78).

9 The Motion to Compel is based on this Notice of Motion, the Joint
10 Stipulation, the Declaration of Todd Gregorian and the Exhibits thereto, filed
11 concurrently herewith, all other pleadings and papers on File in this action, any
12 matters of which this Court may take judicial notice, and such other evidence and
13 argument as may be presented at or before the hearing on this matter.

14 Pursuant to Local Rule 37-1, the parties met and conferred on the matters in
15 the Motion to Compel telephonically on February 4, 2014.

16
17 Dated: April 7, 2014

FENWICK & WEST, LLP

18
19 By /s/ Andrew Bridges
20 Andrew Bridges

21 Attorneys for Defendants
22 GIGANEWS, INC. and LIVEWIRE
23 SERVICES, INC.